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## EASTERN DISTRICT OF VIRGINIA Alexandria Division

CATHERINE AND RICHARD SNYDER,	)
Pro Se Plaintiffs,	)
v.	) No. 1:07-cv-469
GREENBERG TRAURIG, LLP, et al.	)
Defendants.	)
	)

## SECOND PROPOSED RULE 16(b) SCHEDULING ORDER

Upon consideration of the representations made by counsel at the Rule 16(b) Conference, the Court makes the following rulings:

- 1. The proposed Rule 26(f) Joint Discovery Plan is approved and shall control discovery to the extent of its application unless modified by the Court. The discovery deadlines shall be as follows:
  - a. July 25, 2007: Service of initial disclosures and written discovery
  - b. August 2, 2007: Service of any objections to written discovery
  - c. August 13, 2007: Service of responses to written discovery
  - d. **August 27, 2007:** Service of expert disclosures (if applicable)
  - e. **September 4, 2007:** Service of rebuttal expert disclosures (if applicable)
  - f. **September 14, 2007:** Discovery closes
  - g. **September 20, 2007:** Final Pretrial Conference
  - h. September 24, 2007: Dispositive motions filed

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2. Pursuant to the June 21, 2007 Scheduling Order, no party will take more than five

(5) non-party, non-expert depositions without leave of Court, and no party will serve on the other

party more than thirty (30) interrogatories, including parts and subparts, without leave of Court.

3. Any motion to amend the pleadings or to join a party shall be made as soon as

possible after counsel becomes aware of the grounds for the motion.

4. All motions, except for summary judgment, shall be noticed for hearing on the

earliest possible Friday before the pretrial conference. Ten working days' notice is required for

motions to dismiss and for summary judgment. Non-dispositive motions must be filed and

delivered by the Friday before the Friday for which they have been noticed, with responses due

not later than the Wednesday before the hearing.

5. Unless Court permission is obtained in advance, all summary judgment issues

must be presented in the same pleading.

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6. All motions must adhere to the page limits set out in Local Rule 7(F)(3). No

pleading shall be in type less than ten (10) pitch or twelve (12) point.

7. Depositions, interrogatories, requests for documents and admissions and answers

thereto shall not be filed except on Order of the Court, or for use in any motion, or at trial.

Barry R. Poretz

United States Magistrate Judge

Date: July 18, 2007

Alexandria, Virginia

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## **CERTIFICATE OF SERVICE**

Document 24-3

I hereby certify that I will mail a true and accurate copy of the foregoing Second Proposed Rule 16(b) Scheduling Order to non-filing users and *pro se* Plaintiffs Catherine Snyder and Richard Snyder via U.S. mail on this 17<sup>th</sup> day of July, 2007, at the following address:

> Catherine Snyder and Richard Snyder 603 Nash Street Herndon, VA 20170

Thomas G. Connolly Va. Bar No. 29164 Attorney for Defendants Greenberg Traurig, LLP, Harley Lewin, Janet Shih Hajek and Steve Wadyka Harris, Wiltshire & Grannis LLP 1200 Eighteenth Street, N.W., Suite 1200 Washington, D.C. 20036

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